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EXHIBIT 3

Robert A. Julian (SBN 88469)
Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
600 Montgomery Street, Suite 3100
San Francisco, CA 94111-2806
Telephone: 415.659.2600
Facsimile: 415.659.2601
Email: rjulian@bakerlaw.com
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)
David J. Richardson (SBN 168592)
Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
11601 Wilshire Blvd., Suite 1400
Los Angeles, CA 90025-0509
Telephone: 310.820.8800
Facsimile: 310.820.8859
Email: esagerman@bakerlaw.com
Email: drichardson@bakerlaw.com
Email: lattard@bakerlaw.com

Counsel for Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**OFFICIAL COMMITTEE OF TORT
CLAIMANTS' SECOND SET OF
REQUESTS FOR ADMISSION TO
CALIFORNIA GOVERNOR'S OFFICE
OF EMERGENCY SERVICES**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure (the “**Civil Rules**”), as made applicable by Rules 7036 and 9014(c) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and the Local Rules for the United States Bankruptcy Court for the Northern District of California, the Official Committee of Tort Claimants (the “**TCC**”), by and through its undersigned attorneys, hereby serves the following requests for admission (the “**Requests for Admission**”) on the California Governor’s Office of Emergency Services (“**Cal OES**”) in connection with the *Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by California Governor’s Office of Emergency Services (Claim Nos. 87748, 87754, & 87755)* (Dkt. No. 5096) (the “**Cal OES Objection**”), dated December 12, 2019. The TCC requests that Cal OES respond to the Requests for Admission in accordance with Civil Rule 36 by providing written responses to the law offices of Baker & Hostetler LLP, 600 Montgomery Street, Suite 3100, San Francisco, CA 94111-2806.

I. INSTRUCTIONS

1. Civil Rule 36, made applicable to this proceeding pursuant to Bankruptcy Rules 7036 and 9014(c), is hereby incorporated by reference and applies to each of the following instructions.

2. These Requests for Admission are continuing in nature, so as to require supplemental responses, productions, and admissions if further documents are identified, or information is obtained, between the time answers are served and the time Cal OES’ claims are finally adjudicated.

3. If Cal OES fails to respond or object to any Requests for Admission within thirty (30) days of the service of the Requests for Admission, the matter shall be deemed admitted under Civil Rule 36.

4. As is more fully set out in Civil Rule 36(a), Cal OES must admit or deny each request, and, where necessary, specify the parts of each request to which it objects or cannot in good faith admit or deny. If Cal OES objects to only part of a Request for Admission, it must admit or deny the remainder of the Request for Admission. If Cal OES objects to or denies any Request

1 for Admission or portion of a Request for Admission, Cal OES must state the reasons for its
2 objection or denial.

3 5. Unless otherwise specified, the time period covered by these Requests for
4 Admission is from September 9, 2015 to the present.

5 **II. DEFINITIONS**

6 1. The term “**Butte Fire**” shall have the same meaning as that term is used in the Butte
7 Fire Claim.

8 2. The term “**Butte Fire Claim**” shall mean the Proof of Claim (Official Form 410)
9 (Claim Number 87748) filed by the California Governor’s Office of Emergency Services in the
10 Chapter 11 Cases on or about November 15, 2019.

11 3. The term “**Cal OES**” or “**You**” shall mean or refer to the California Governor’s
12 Office of Emergency Services.

13 4. The term “**Camp Fire**” shall have the same meaning as that term is used in the Camp
14 Fire Claim.

15 5. The term “**Camp Fire Claim**” shall mean the Proof of Claim (Official Form 410)
16 (Claim Number 87755) filed by the California Governor’s Office of Emergency Services in the
17 Chapter 11 Cases on or about November 15, 2019.

18 6. The term “**Chapter 11 Cases**” shall mean the chapter 11 cases commenced by
19 PG&E Corporation and Pacific Gas and Electric Company in the United States Bankruptcy Court
20 for the Northern District of California, Case No. 19-30088.

21 7. The term “**North Bay Fires**” shall have the same meaning as that term is used in
22 the North Bay Fires Claim.

23 8. The term “**North Bay Fires Claim**” shall mean the Proof of Claim (Official
24 Form 410) (Claim Number 87754) filed by the California Governor’s Office of Emergency
25 Services in the Chapter 11 Cases on or about November 15, 2019.

1 **III. REQUESTS FOR ADMISSION**

2 **REQUEST FOR ADMISSION NO. 1:**

3 Admit that the Butte Fire Claim does not include any amounts for damages caused by the
4 Butte Fire to property owned by Cal OES.

5 RESPONSE:

6 **REQUEST FOR ADMISSION NO. 2:**

7 Admit that the North Bay Fires Claim does not include any amounts for damages caused by
8 the North Bay Fires to property owned by Cal OES.

9 RESPONSE:

10 **REQUEST FOR ADMISSION NO. 3:**

11 Admit that the Camp Fire Claim does not include any amounts for damages caused by the
12 Camp Fire to property owned by Cal OES.

13 RESPONSE:

14
15 Dated February 6, 2020

BAKER & HOSTETLER LLP

16 By: /s/ Eric R. Goodman
Eric R. Goodman

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18 *Attorney for The Official Committee of Tort*
19 *Claimants*
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